REMARKS

In the above-mentioned office action, all the pending claims, claims 1-9, were rejected. over *Zeira, et.al.*

The applicants respectfully traverse the rejection of the claims over *Zeira* for reasons that follow.

Review of *Zeira* indicates that the reference is directed primarily towards the establishment of a temporary dedicated channel in a wireless communication system. Alternative embodiments describe the establishment of a back-to-back temp-DCH channel and of the addition of a start/stop function to a medium access controller used in conjunction with temp-DCH and other applications.

In contrast, the present invention is directed towards a cell update procedure in a universal mobile telecommunication system. And, in particular, the present invention is directed towards strategies to deal with interaction of a cell update procedure with a reconfiguration that has already started. User entity behavior is enabled to be unambiguous when a cell update is required during an ongoing reconfiguration.

In this regard, therefore, claim 1 recites a method including the steps of detecting a trigger event which indicates that a cell update is required and of canceling the reconfiguration procedure in response to the trigger event. Claim 1, therefore, recites the cancellation of the reconfiguration procedure in response to detection of the trigger event which indicates that a cell update is required.

In contrast, *Zeira* fails to disclose, or imply, detection of a trigger event which indicates that a cell update is required and cancellation of the reconfiguration procedure in response to the trigger event, all as recited in claim 1. Paragraph 168 of *Zeira* states, for instance, that an "event A" which may be a reconfiguration or a handover. However, even if a cell update is considered to be equivalent to a handover, at this stage, *Zeira* makes no distinction between reconfiguration and a handover. *Zeira* neither discloses nor suggests detection of a trigger event which indicates that a cell update is required nor of cancellation of the reconfiguration procedure in response to the trigger event as recited in claim 1.

Claim 6 is analogously analyzed. That is to say, *Zeira* neither discloses an event detector that detects a trigger event which indicates that a cell update is required nor a controller arranged to cancel the reconfiguration procedure in response to the trigger event.

Dependent claims 2-5 and 7-9 include all the limitations of their respective parent claims. These claims are believed to be patentably distinguishable over *Zeira* for the same reasons as those given with respect to their parent claims.

In light of the foregoing, therefore, independent claims 1 and 6, and the dependent claims dependent thereon, are believed to be in condition for allowance. Accordingly, reexamination and reconsideration for allowance of the claims is respectfully requested. Such early action is earnestly solicited.

Respectfully submitted,

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